

# **EXHIBIT 29**

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1

2 UNITED STATES DISTRICT COURT  
3 SOUTHERN DISTRICT OF NEW YORK

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4 MARK I. SOKOLOW, et al.,

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PLAINTIFFS,

6

7 -against- Case No:  
04CV 397 (GBD) (RLE)

8

9 THE PALESTINE LIBERATION ORGANIZATION, et  
al.,

10

DEFENDANTS.

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12 DATE: October 3, 2012

13 TIME: 2:46 P.M.

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16 DEPOSITION of the ELANA SOKOLOW

17 - ROSMAN, taken by the Defendants, pursuant

18 to Notice and to the Federal Rules of Civil

19 Procedure, held at the offices of Morrison

20 & Foerster, 1290 Avenue of the Americas,

21 New York, New York 10104, before Robert X.

22 Shaw, CSR, a Notary Public of the State of

23 New York.

24

25

1 Elana Sokolow - Rosman

2 the process?

3 A. No, I don't.

4 Q. Is there any reason you won't  
5 be able to give complete and truthful  
6 testimony today?

7 A. No.

8 Q. Were you present at the bombing  
9 in which your family members were injured  
10 in January of 2002?

11 A. No, I was not.

12 Q. Are you claiming to have  
13 suffered any physical injury as a result  
14 that bombing?

15 A. No, I am not.

16 Q. Do you believe that you have a  
17 mental illness as a result of that bombing?

18 A. I was --

19 MR. SOLOMON: Objection. Note  
20 my objection. Calls for expert  
21 testimony. The witness can answer.  
22 Go ahead.

23 A. I was never evaluated by anyone  
24 objective to say whether I do or do not  
25 have a mental illness.

1 Elana Sokolow - Rosman

2 injured?

3 A. What I can say is, I recall  
4 hearing from the media that Wafa Idris was  
5 transported into Jerusalem in a Palestinian  
6 ambulance and that she was a member of the  
7 Al Aksa Martyrs Brigade, which, I believe,  
8 has ties with the PLO. But that's the  
9 extent of my knowledge.

10 Q. Do you recall from what media  
11 source you consumed the report you've just  
12 described?

13 A. No, I don't.

14 Q. Have you maintained a copy of  
15 this media report?

16 A. No, I have not.

17 Q. Do you know if anyone has a  
18 copy of this media report?

19 A. I have no idea.

20 Q. Okay. Apart from that media  
21 report, are you aware of any other media  
22 reports implicating the PLO in the bombing  
23 in which your family was involved?

24 A. No, I'm not.

25 Q. Okay. You mentioned that you'd

1 Elana Sokolow - Rosman

2 had some conversations with your family  
3 members about this subject. Apart from  
4 talking with your family members, are you  
5 aware of, have you spoken to anyone else  
6 who's told you that the PLO was involved in  
7 the attack in which your family was  
8 injured?

9 A. No, I do not.

10 Q. Have you now told me about all  
11 the evidence you're aware of that the PLO  
12 might have had something to do with the  
13 attack on your family?

14 A. Yes, I have.

15 Q. You haven't ever spoken to  
16 anyone from the PLO, I take it?

17 A. No, I haven't.

18 Q. Have you spoken to any  
19 Palestinians about this?

20 A. No.

21 Q. I'd like to ask you about the  
22 Palestinian Authority. The answers may be  
23 the same, but let me ask you anyway.

24 Are you aware of any evidence  
25 that the Palestinian Authority had anything

1 Elana Sokolow - Rosman

2 to do with the January, 2002 attack in  
3 which your family was injured?

4 A. Aside from the media, and  
5 discussions with my family, I do not have  
6 any evidence or any documents.

7 Q. Okay. Are you recalling a  
8 media report that implicated the  
9 Palestinian Authority in the attack on your  
10 family?

11 A. Um, the same media report that  
12 I heard from the PLO that we discussed.

13 Q. Okay. So, apart from what  
14 we've already described, what you've  
15 already described as a media report about  
16 an ambulance and the Al Aksa Martyrs  
17 Brigades, you're not aware of any other  
18 media reporting indicating that the PA had  
19 something to do with this attack?

20 A. That's correct.

21 Q. Okay. You mentioned, again,  
22 that you discussed this with your family.

23 Have you spoken to anyone other  
24 than your family members about whether the  
25 PA had something to do with the attack in

1 Elana Sokolow - Rosman

2 which they were injured?

3 A. No, I have not.

4 Q. Okay. You mentioned earlier  
5 that you were relying on your lawyers. Do  
6 you know if your lawyers are in possession  
7 of any evidence that the PA had something  
8 to do with the attack in which your family  
9 members were injured?

10 A. I rely on them, um, and I rely  
11 on my family, who hired the lawyers, but I  
12 don't, I have never seen any of the  
13 documents, and I don't know what they  
14 entail.

15 Q. Okay. So, just so the record  
16 is clear, you don't know if your lawyers,  
17 in fact, have any evidence indicating the  
18 PA had something to do with this bombing;  
19 is that fair to say?

20 A. Yes.

21 Q. Is it also fair to say that you  
22 don't know if your lawyers have any  
23 evidence that the PLO had something to do  
24 with this bombing?

25 A. Yes.